

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, *et al.*,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 09-01364 (CGM)

STIPULATION AND ORDER

Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-*lll* (“SIPA”), substantively consolidated with the chapter 7 estate of Bernard L. Madoff, and defendant HSBC Securities Services (Luxembourg) S.A. (“HSSL”) (together, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on November 16, 2020, the Trustee filed a motion seeking the issuance of a Letter of Request requesting documents from HSSL, a Luxembourg entity (ECF No. 648) (the “Motion”);

WHEREAS, the Parties have agreed to adjourn the briefing schedule and hearing date to allow the parties to continue to meet and confer on the Trustee’s request and attempt to resolve any objections;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. The deadline to file an objection to the Motion is adjourned from March 24, 2021 to April 22, 2021;
2. The deadline to file a reply is adjourned from April 16, 2021 to May 13, 2021;
3. The hearing date for the Motion is scheduled for May 19, 2021; and
4. This stipulation is without prejudice to the arguments of either HSSL or the Trustee, including but not limited to that the Court lacks personal jurisdiction over HSSL.

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Dated: March 22, 2021
New York, New York

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

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*Attorneys for HSBC Securities Service
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Dated: March 23, 2021
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge